

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket Nos. 651, 657, 766 941, 1014  
& 1016**

**NOTICE OF FILING OF SECOND SUPPLEMENTAL PLAN  
SUPPLEMENT FOR THE THIRD MODIFIED FIRST  
AMENDED JOINT CHAPTER 11 PLAN OF LORDSTOWN  
MOTORS CORP. AND ITS AFFILIATED DEBTORS**

**PLEASE TAKE NOTICE** that on November 1, 2023, the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”) entered an order [Docket No. 651] (the “**Disclosure Statement Order**”): (a) approving the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Disclosure Statement**”) and the form and manner of notice; (b) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan (the “**Solicitation Procedures**”); (c) approving the forms of ballots; (d) approving the form, manner and scope of confirmation notices; (e) establishing certain deadlines in connection with approval of the Disclosure Statement and confirmation of the Plan (defined below); and (f) granting related relief.

**PLEASE TAKE FURTHER NOTICE** that, on December 1, 2023, the Debtors filed *Notice of Filing of Plan Supplement for the Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 766] (the “**Original Plan Supplement**”).

**PLEASE TAKE FURTHER NOTICE** that, on January 31, 2024, the Debtors filed the *Second Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 941].

**PLEASE TAKE FURTHER NOTICE** that, on February 28, 2024, the Debtors filed the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated*

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

*Debtors* [Docket No. 1014] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Plan**”).

**PLEASE TAKE FURTHER NOTICE** that, the Debtors filed *Notice of Filing of First Supplemental Plan Supplement for the Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 1016] (the “**First Supplemental Plan Supplement**”).<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that, by this notice (the “**Second Supplemental Plan Supplement**,” and together with the Original Plan Supplement and the First Supplemental Plan Supplement, the “**Plan Supplement**”) the Debtors hereby file (a) the following revised exhibits: (i) a revised Schedule of Retained Causes of Action (attached as **Exhibit C-1**), along with a blackline to the draft included in the First Supplemental Plan Supplement (attached as **Exhibit C-2**), (ii) a revised disclosure regarding the Identity of the Claims Ombudsman and Rates (attached as **Exhibit F-1**), along with a blackline to the draft included in the First Supplemental Plan Supplement (attached as **Exhibit F-2**), and (iii) a revised disclosure regarding the Identity of the Claims Ombudsman and Rates (attached as **Exhibit H-1**), along with a blackline to the draft included in the First Supplemental Plan Supplement (attached as **Exhibit H-2**); and (b) the proposed longform notice and proof of claim form related to the Ohio Securities Litigation Settlement (attached as **Exhibit K-3**, and **Exhibit K-4**), which were not previously included in the Original Plan Supplement or the First Supplemental Plan Supplement. A chart of the complete Plan Supplement is as follows:

<b>Exhibit</b>	<b>Document<sup>3</sup></b>	<b>Reference</b>
A	New Organizational Documents	Docket No. 1016, Ex. A-1
B	Identities of members of the New Board and Officers of Post-Effective Date Debtors	Docket No. 766, Ex. B
C-1	Schedule of Retained Causes of Action	Attached hereto as <b><u>Exhibit C-1</u></b>
C-2	Blackline of Schedule of Retained Causes of Action to December 1, 2023 Draft	Attached hereto as <b><u>Exhibit C-2</u></b>
D	Post-Effective Date Debtor Amount	Docket No. 766, Ex. D
E	GUC Reserve	Docket No. 1016, Ex. E
F-1	Identity of Claims Ombudsman and Rates	Attached hereto as <b><u>Exhibit F-1</u></b>
F-2	Blackline of Identity of Claims Ombudsman and Disclosure Regarding Rates	Attached hereto as <b><u>Exhibit F-2</u></b>
G	Identity of Litigation Trustee	Docket No. 1016, Ex. G

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Plan or the Disclosure Statement, as applicable.

<sup>3</sup> The exhibits set forth in the Plan Supplement remain subject to ongoing review and material revision in all respects.

<b>Exhibit</b>	<b>Document<sup>3</sup></b>	<b>Reference</b>
H-1	Litigation Trust Agreement	Attached hereto as <b><u>Exhibit H-1</u></b>
H-2	Blackline of Litigation Trust Agreement	Attached hereto as <b><u>Exhibit H-2</u></b>
I	Schedule of Contracts Rejected Pursuant to Plan	Docket No. 1016, Ex. I
J	Asserted Claims Schedule	Docket No. 1016, Ex. J
K-1	Ohio Settlement Notice – Post-Card Notice	Docket No. 1016, Ex. K-1
K-2	Ohio Settlement Notice – Publication Notice	Docket No. 1016, Ex. K-2
K-3	Ohio Settlement Notice – Longform Notice <sup>4</sup>	Attached hereto as <b><u>Exhibit K-3</u></b>
K-4	Ohio Settlement Notice – Proof of Claim Form	Attached hereto as <b><u>Exhibit K-4</u></b>

**PLEASE TAKE FURTHER NOTICE** that the documents, schedules, and other information contained in this Plan Supplement (in each case, as may be amended, modified, or supplemented) are integral to and part of the Plan. These documents have not yet been approved by the Bankruptcy Court. If the Plan is approved, the documents contained in the Plan Supplement will be approved by the Bankruptcy Court pursuant to the Confirmation Order.

**PLEASE TAKE FURTHER NOTICE** that the Debtors reserve all rights to amend, modify, or supplement the Plan Supplement, and any of the documents contained therein, in accordance with the terms of the Plan. If material amendments or modifications are made to any of these documents, the Debtors will file a blackline with the Bankruptcy Court prior to the Confirmation Hearing marked to reflect the same.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing to consider confirmation of the Plan (the “**Confirmation Hearing**”) has been scheduled for **March 5, 2024 at 3:00 p.m. (prevailing Eastern Time)**, before the Honorable Mary F. Walrath, United States Bankruptcy Judge, at the Bankruptcy Court, located at 824 North Market Street, Fifth Floor, Courtroom No. 4, Wilmington, Delaware 19801. **The Confirmation Hearing may be adjourned or continued from time to time by the Bankruptcy Court or the Debtors without further notice other than adjournments announced in open court or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtors with the Bankruptcy Court.**

**PLEASE TAKE FURTHER NOTICE THAT** you may obtain the Plan, the Disclosure Statement, the Plan Supplement, or related documents from Kurtzman Carson Consultants LLC

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<sup>4</sup> The longform Ohio Settlement Notice was drafted by Ohio Class Counsel for their distribution to the Ohio Litigation Settlement Class Members. It does not reflect the views of any other party (including the Debtors, the Post-Effective Date Debtors, the UCC, or the EC) on the matters or construal of facts contained therein. By including the longform notice in this Plan Supplement and seeking approval of the same in connection with confirmation of the Plan, such other parties make no admission or concession and reserve all rights.

(the “**Solicitation Agent**”) free of charge by: (a) calling the Debtors’ toll-free restructuring hotline at (877) 709-4757 (U.S./Canada) or (424) 236-7235 (international); (b) visiting the Debtors’ restructuring website at <https://www.kccllc.net/lordstown>; (c) writing to Lordstown Processing Center, c/o Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245; or (d) emailing [lordstowninfo@kccllc.com](mailto:lordstowninfo@kccllc.com) (with ‘Lordstown’ in the subject line).

You may also access from these materials for a fee via PACER at <http://www.deb.uscourts.gov/>.

**YOU ARE ADVISED TO CAREFULLY REVIEW AND CONSIDER THE PLAN, INCLUDING THE DISCHARGE, INJUNCTION, RELEASE, AND EXCULPATION PROVISIONS CONTAINED IN ARTICLE VIII OF THE PLAN. ARTICLE VIII.D OF THE PLAN CONTAINS THIRD-PARTY RELEASES. THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.**

**THIS NOTICE IS BEING SENT TO YOU FOR INFORMATIONAL PURPOSES ONLY. IF YOU HAVE QUESTIONS WITH RESPECT TO YOUR RIGHTS UNDER THE PLAN OR ABOUT ANYTHING STATED HEREIN OR IF YOU WOULD LIKE TO OBTAIN ADDITIONAL INFORMATION, PLEASE CONTACT THE SOLICITATION AGENT AS SPECIFIED ABOVE. PLEASE NOTE THAT THE SOLICITATION AGENT MAY NOT PROVIDE LEGAL ADVICE. IF YOU NEED LEGAL ADVICE, PLEASE CONSULT WITH YOUR ATTORNEY.**

Dated: March 1, 2024

Respectfully submitted,

/s/ Morgan L. Patterson

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